

JENNIFER LEE TAYLOR (SBN 161368)  
JTaylor@mofo.com  
STACEY M. SPRENKEL (SBN 241689)  
SSprenkel@mofo.com  
JOYCE LIOU (SBN 277720)  
JLiou@mofo.com  
AMANDA D. PHILLIPS (SBN 305614)  
APhillips@mofo.com  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: (415) 268-7000  
Facsimile: (415) 268-7522

*Attorneys for Defendants and Counterclaimant*  
UBIQUITI NETWORKS, INC., and  
CHING-HAN TSAI

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

SYNOPSYS, INC.,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., UBIQUITI  
NETWORKS INTERNATIONAL LIMITED,  
CHING-HAN TSAI, and DOES 1-20,  
inclusive

Defendants.

UBIQUITI NETWORKS, INC.,

Counterclaimant,

v.

SYNOPSYS, INC.,

Counterdefendant.

Case No. 5:17-cv-00561-WHO

**DECLARATION OF JENNIFER  
LEE TAYLOR IN SUPPORT OF  
UBIQUITI NETWORKS, INC.  
AND CHING-HAN TSAI'S  
MOTION FOR  
ADMINISTRATIVE RELIEF TO  
EXCEED PAGE LIMIT UNDER  
LOCAL RULE 7-11**

1 I, Jennifer Lee Taylor, do hereby declare as follows:

2 1. I am a partner at the law firm of Morrison & Foerster LLP, attorneys of record in  
3 this action for defendants Ubiquiti Networks, Inc. and Ching-Han Tsai ("Defendants"). I submit  
4 this declaration in support of Defendants' motion for administrative relief under Local Rule 7-11  
5 to exceed the page limits set by L.R. 7-4(b). Unless otherwise indicated, I have personal  
6 knowledge of the matters set forth below. If called as a witness, I could and would testify  
7 competently as follows.

8 2. On April 28, 2017, I contacted Denise Mingrone, counsel for Plaintiff, to seek  
9 Plaintiff's consent to Defendants' request to file a 20-page brief in connection with Defendants'  
10 Reply in support of its Motion to Dismiss the Second, Third, Fourth, Fifth, Sixth, and Seventh  
11 Claims in Plaintiff's Amended Complaint for failure to state a claim. (See Ex. A, April 28, 2017  
12 Email from J. Taylor to D. Mingrone, attached hereto). Ms. Mingrone promptly replied, refusing  
13 to consent to an additional five pages unless Defendants agreed that Plaintiff can file a Surreply.  
14 (See Ex. B, April 28, 2017 Email from D. Mingrone to J. Taylor.)  
15

16 I declare under the penalty of perjury under the laws of the United States of America that  
17 the forgoing is true and correct. Executed on April 28, 2017 at San Francisco, California.  
18

19 By: /s/ Jennifer Lee Taylor  
20 Jennifer Lee Taylor  
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28

# EXHIBIT A

**From:** Taylor, Jennifer Lee (SF)  
**To:** [Mingrone, Denise M.](#); ["Uriarte, Robert L."](#)  
**Cc:** [Liou, Joyce](#); [Phillips, Amanda D.](#); [Sprenkel, Stacey M.](#)  
**Bcc:** [Sario, Lucia M.](#)  
**Subject:** Stipulation for overlength brief  
**Date:** Friday, April 28, 2017 8:55:28 AM

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Denise and Rob,

It looks like we will need 20 pages to address the issues in your opposition to Tsai's and UBNT's 12(b) (6) motion. Can you let us know if you will consent to an additional five pages? We would like to get a stipulation on file today.

Thank you,

Jennifer

**Jennifer Lee Taylor**

Morrison & Foerster LLP

425 Market St. | San Francisco, CA 94105

P: +1 (415) 268.6538 | F: +1 (415) 276.7239

JTaylor@mofo.com | [www.mofo.com](http://www.mofo.com)

# EXHIBIT B

**From:** [Mingrone, Denise M.](#)  
**To:** [Taylor, Jennifer Lee \(SF\)](#); [Uriarte, Robert L.](#)  
**Cc:** [Liou, Joyce](#); [Phillips, Amanda D.](#); [Sprenkel, Stacey M.](#)  
**Subject:** [EXT] RE: Stipulation for overlength brief  
**Date:** Friday, April 28, 2017 9:29:58 AM

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Hi Jennifer,

We disagree that any additional pages are needed; we addressed all arguments Ubiquiti raised within our page limits and see no reason why additional pages would be needed to reply. Nonetheless and in the spirit of compromise, if you want to draft a stipulation that states "Synopsis does not believe additional pages are needed in reply but respectfully requests that if the Court disagrees and allow Ubiquiti 5 extra pages on reply, that Synopsis be given the opportunity to submit a 5 page surreply," we will consider such stipulation.

Let us know how you would like to proceed. Thanks,  
Denise

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**From:** Taylor, Jennifer Lee (SF) [mailto:JTaylor@mofo.com]  
**Sent:** Friday, April 28, 2017 8:55 AM  
**To:** Mingrone, Denise M. <dmingrone@orrick.com>; Uriarte, Robert L. <ruriarte@orrick.com>  
**Cc:** Liou, Joyce <JLiou@mofo.com>; Phillips, Amanda D. <APhillips@mofo.com>; Sprenkel, Stacey M. <SSprenkel@mofo.com>  
**Subject:** Stipulation for overlength brief

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It looks like we will need 20 pages to address the issues in your opposition to Tsai's and UBNT's 12(b)(6) motion. Can you let us know if you will consent to an additional five pages? We would like to get a stipulation on file today.

Thank you,

Jennifer

**Jennifer Lee Taylor**  
Morrison & Foerster LLP  
425 Market St. | San Francisco, CA 94105  
P: +1 (415) 268.6538 | F: +1 (415) 276.7239  
[JTaylor@mofo.com](mailto:JTaylor@mofo.com) | [www.mofo.com](http://www.mofo.com)

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